

Groundwater & Environmental Services, Inc.

1737 Georgetown Road, Unit E Hudson, OH 44236

T. 877.505.9382

June 3, 2019 Reference No. 039611

Director, Superfund Division c/o Mr. Rosauro del Rosario EPA Project Manager/Coordinator U.S. Environmental Protection Agency (USEPA), Region 5 77 West Jackson Boulevard Chicago, Illinois 60604

Mr. John Matson Associate Regional Counsel U.S. Environmental Protection Agency (USEPA), Region 5 77 West Jackson Boulevard, C-14J Chicago, Illinois

60604

Mr. Douglas Petroff
Senior Environmental Manager
Indiana Department of Environmental Management (IDEM)
Federal Programs
MC 66-31, Room 1101
100 N. Senate Avenue
Indianapolis, Indiana
46206-6015

Dear: Director, Mr. del Rosario, Mr. Matson, and Mr. Petroff:

Re: Quarterly Progress Report – June 2019
Remedial Design/Remedial Action (RD/RA)
Himco Dump Site, Elkhart, Indiana (Site)

In accordance with your email on October 11, 2018, USEPA temporarily alleviated the monthly recurrence (Paragraph 31 of the HIMCO CERCLA RD/RA Consent Decree (CD), which was lodged with the United States District Court for the Northern District of Indiana on September 7, 2007) to quarterly with report submissions due in December, March, June, September, etc. This report is submitted by Groundwater & Environmental Services, Inc. (GES) on behalf of the Performing Settling Defendants (PSDs), collectively known as the Himco Site Trust (the Trust).

A Site plan that presents all monitoring locations is presented as **Figure 1** for your reference while reviewing this Progress Report.

Sent Via Email

Sent Via Email

delrosario.rosauro@epa.gov

matson.john@epa.gov

Sent Via Email

dpetroff@idem.in.gov



1. Actions Taken Toward Achieving Compliance with the Consent Decree

The PSDs completed the following tasks since March 2019:

No actions required.

2. Sampling/Test Results

 In April 2019, GES completed the biennial groundwater and soil gas sampling. Results will be incorporated under a future submission.

3. Deliverables Submitted During the Reporting Period

The PSDs submitted the following deliverables to USEPA during the quarterly reporting period:

- The Trust submitted the Institutional Controls Implementation and Assurance Plan (Long-Term Stewardship Plan) on December 12, 2018. USEPA provided conditional approval on April 3, 2019. The Trust resubmitted the plan on April 30, 2019 which incorporated minor changes (e.g., "deed restrictions" to "deed notices" and figure/table redactions).
- In April 2019, GES repaired fence and SGP damage resulting from winter vehicular accidents.
- In May 2019, GES completed the private well abandonment and connection to the municipal water supply for ESM Auto Sales LLC. The property at 27947 Westwood Drive has already been connected to the municipal water supply; thus, no further action is required.
- On May 31, 2019, the Biennial Soil Gas Monitoring Report was submitted documenting the soil gas monitoring activities and results that were collected in April 2019.

4. Projected Work for the Next 6 Weeks

The updated project schedule is attached as Figure 2. The Trust will commence and/or continue the following activities over the next six weeks:

The Trust and GES are beginning work on the next Annual Groundwater Monitoring Report which will include results from October 2018 and April 2019, as well as an enhanced discussion of recent reports, and recent endeavors and site controls to provide a current, holistic perspective of the site, condition, and future. It will also include a section with statistical/trend analyses for sampling data since 2012 (e.g., ~13 events) for relevant parameters and aquifers as outlined in the attached table.

Delays and Percentage Completion

None anticipated.

6. Proposed Modifications to Plans or Schedule

As permitted by the 2004 ROD, a request to reduce the soil gas sampling and landfill inspection frequency was submitted to the USEPA on August 1, 2018. The USEPA approved, via email, the request on August 2, 2018; the semi-annual schedule began in October 2018.



The O&M schedule is provided as Figure 2. The status (Planned, In Progress or Complete) of each task has been updated.

The schedule has been updated to present planned 2019 activities.

Several completed items have been "rolled up" to simplify the presentation of the schedule.

The schedule will be updated in each Quarterly Progress Report.

7. Community Relation Plan Support and Related Activities

There was no community relation plan support or related activities completed since December 2018.

Should you have any questions on the above, please do not hesitate to contact us.

Sincerely,

GROUNDWATER & ENVIRONMENTAL SERVICES, IINC.

Stephen E. Betts

Senior Project Manager

sbetts@gesonline.com

(877) 505-9382 x4276

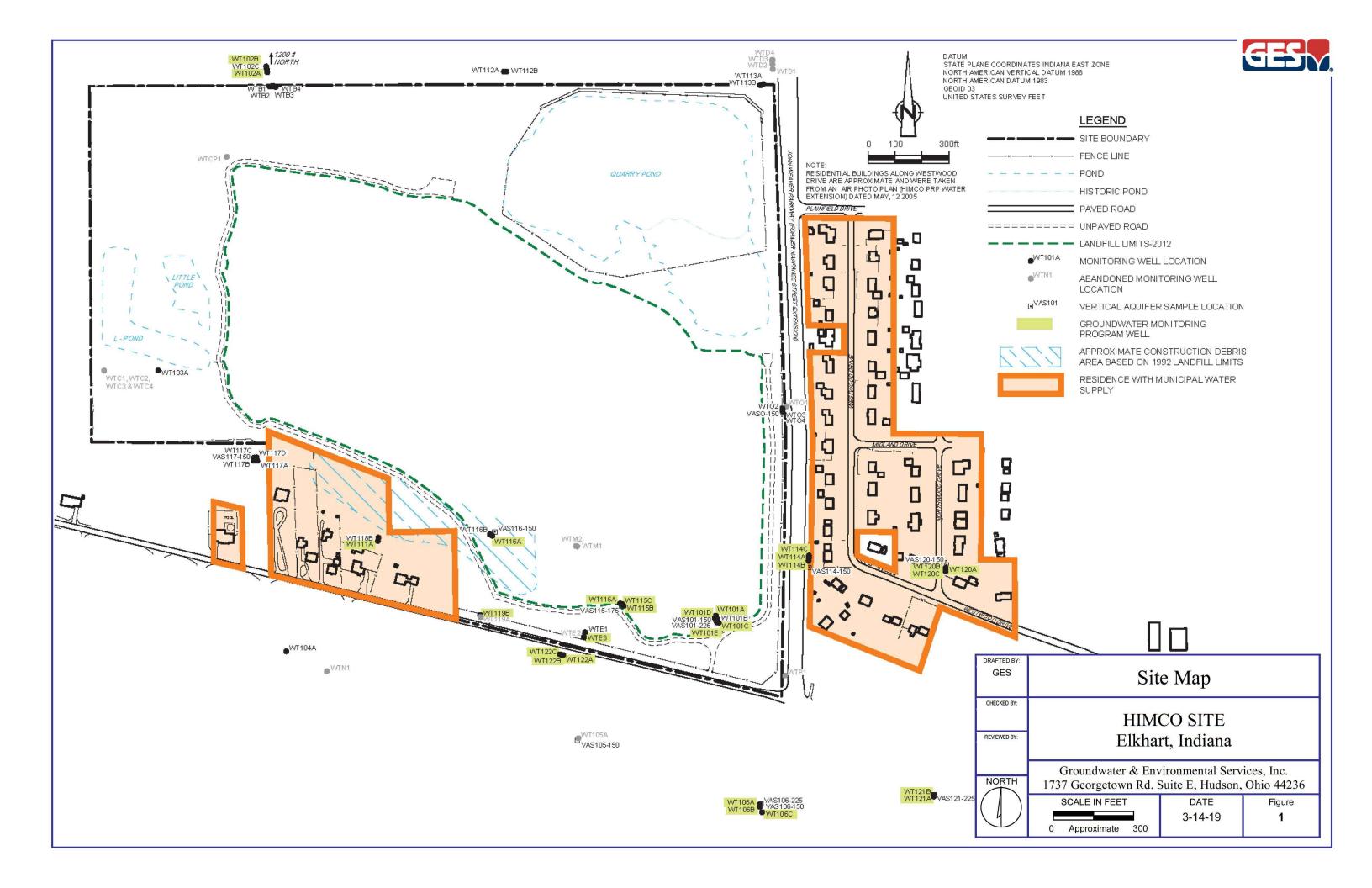
Encl.

cc: Matt Myers, Bayer Corporation Project Coordinator (via email)

Chintan Amin, Bayer Corporation (via email)



Figures



Task Name	Duration (calendar days)	Start	Finish	Current Status			-				
Construction Completion Report / Completion of Remedial Action	1 day	Wod 9/15/12	Wed 8/15/12	Complete	Dec	Jan 1s	t Quarter Feb	Mar	Apr 2	2nd Quarter May	Jun
Report											
USEPA Review/Conditional Approval of Construction Completion Report / Completion of Remedial Action Report	28 days	Thu 8/16/12	Wed 9/12/12	Complete							
Response to USEPA Review/Conditional Approval of the Construction Completion Report/Completion of Remedial Action Report	34 days	Thu 9/13/12	Tue 10/16/12	2 Complete							
USEPA Approval of the Construction Completion Report/Completion of Remedial Action Report	1 day	Wed 10/31/12	Wed 10/31/12	2 Complete							
Groundwater Monitoring Program	2371 days	Mon 4/23/12	Fri 10/19/18	In Progress							
Groundwater Monitoring Program 2012 & 2013 Plan	2000 days	Mon 4/23/12	Fri 10/13/17	Complete							
Groundwater Monitoring Program (S13)	5 days	Mon 4/23/18	Fri 4/27/18	Complete							
Groundwater Monitoring Program (S14)	5 days	Mon 10/15/18	Fri 10/19/18	Complete							
Groundwater Monitoring Program Reporting	2175 days?	Sat 12/1/12	Wed 11/14/18	8 In Progress							
2012 Annual Groundwater Monitoring Report	210 days	Sat 12/1/12	Fri 6/28/13	Complete							
2013 Annual Groundwater Monitoring Report	351 days	Tue 12/31/13	Tue 12/16/14	Complete							
2014 Annual Groundwater Monitoring Report	349 days	Wed 12/17/14	Mon 11/30/15	5 Complete							
2015 Annual Groundwater Monitoring Report	350 days	Mon 11/30/15	Sun 11/13/16	Complete							
2016 Annual Groundwater Monitoring Report	81 days	Wed 11/30/16	Sat 2/18/17	Complete							
2017 Annual Groundwater Monitoring Report	107 days	Thu 11/30/17	Fri 3/16/18	Complete							
2018 Annual Groundwater Monitoring Report	350 days	Thu 11/30/17	Wed 11/14/18	8 Complete							
O&M Site Inspections	2229 days	Mon 9/17/12	Wed 10/24/18	8 In Progress							
O&M Site Inspection 2012 & 2013	463 days	Mon 9/17/12	Mon 12/23/13	3 Complete							
O&M Site Inspection 2014	369 days	Thu 3/27/14	Mon 3/30/15	Complete							
O&M Site Inspection 2015		Thu 6/25/15	Tue 12/29/15	Complete							
O&M Site Inspection 2016	5	Wed 3/30/16	Wed 12/28/16	6 Complete							
O&M Site Inspection 2017		Wed 3/29/17	Wed 12/20/17	7 Complete							
O&M Site Inspection 2018		Thu 3/29/18	Wed 10/24/18	7 Table 10 T				-			
O & M Site Inspection (Q1-18)	1 day	Thu 3/29/18		Complete							
O & M Site Inspection (Q2-18)	1 day	Tue 6/12/18		Complete							
O & M Site Inspection (2SA-18)	1 day	Wed 10/24/18	Wed 10/24/18								
O&M Site Monitoring		Mon 9/17/12									
O&M Site Monitoring 2012 & 2013		Mon 9/17/12									
O&M Site Monitoring 2014		Thu 3/27/14	Fri 12/12/14	- Landerstein -							
O&M Site Monitoring 2015		Mon 3/30/15	Sat 1/2/16								
O&M Site Monitoring 2016		Wed 3/30/16									
O&M Site Monitoring 2017	360 days	Fri 1/6/17	Sun 12/31/17								
O&M Site Monitoring 2018		Thu 3/29/18	Wed 10/24/18					-			
O&M Site Monitoring (Q1-18)	1 day	Thu 3/29/18		Complete							
O&M Site Monitoring (Q2-18)	1 day	Tue 6/12/18		Complete							
O&M Site Monitoring (2SA-18)	1 day	Wed 10/24/18	Wed 10/24/18								
Methane Investigation and Monitoring Plan (MIMP)/ Response to USEPA's October 25, 2012 letter	1118 days	Thu 11/8/12	Mon 11/30/15	1							
USEPA Request for Information to Support 5-Year Review	195 days	Wed 2/18/15	Mon 8/31/15	Complete							
USEPA 5-Year Review Report	875 days	Wed 3/9/16	Tue 7/31/18	Complete							
Respond to Action Request in 5-Year Review Report	240 days	Wed 3/9/16	Thu 11/3/16	Complete							
Prepare Institutional Control Stewardship Plan	37 days	Mon 8/1/16	Tue 9/6/16	Complete							
Respond to Comments on IC Stewardship Plan	310 days	Sun 2/25/18	Mon 12/31/18	In Progress			*				
Drainage Improvements	1064 days	Sun 11/15/15	Sat 10/13/18	Complete							
Private Well Sampling	52 days	Mon 7/23/18	Wed 9/12/18	Complete							
Private Well Sampling	52 days	Mon 7/23/18	Wed 9/12/18	Complete							